<u>REMARKS</u>

Applicants request favorable reconsideration and withdrawal of the rejections set forth in the above-mentioned Office Action in view of the foregoing amendments and the following remarks.

Initially, Applicants again request that the PTO 1449 Form filed with the Information Disclosure Statement of May 3, 2004, which cites EP 1 146 461 A2, be initialed as considered by the Examiner and a copy returned with the next Office Action. Applicants requested this action with their previous response, but did not receive such a copy of the PTO 1449 Form with the latest Office Action, or an indication why the Office was refusing to perform such action.

Claims 1, 3-10, 13, and 14 are now pending, with claims 1, 7, and 8 being independent claims. Claims 1, 7, and 8 have been amended herein. Support for the amendments can be found throughout the originally-filed disclosure, including, for example, in Figure 1 and at paragraphs 0014 and 0015 of the specification. Thus, Applicants submit the amendments include no new matter.

Claims 1, 3-10 and 13-14 are rejected in the Office Action under 35 U.S.C. § 103(a) as being unpatentable over <u>Halliday et al.</u> (U.S. Patent App. Pub. No. 2002/0083003) in view of <u>Suorsa</u> (U.S. Patent No. 7,124,289), <u>Yu</u> (U.S. Patent No. 5,433,483), <u>Roche</u> (U.S. Patent No. 4,879,557), <u>Vaghi</u> (U.S. Patent No. 6,047,273), and <u>Taylor et al.</u> (U.S. Patent No. 6,256,676).

Applicants respectfully traverse the rejections. Nevertheless, without conceding the propriety of the rejections and solely to expedite prosecution, independent claims 1, 7, and 8 have been amended to clarify the distinctions between the cited references and the claims.

Accordingly, Applicants submit that the invention recited in the independent claims is patentably defined over the cited references for at least the following reasons.

Amended independent claim 1 recites a vertically integrated method for facilitating the processing of transactions comprising, <u>inter alia</u>, receiving a request at a host system from an entity for a transaction, and determining, at the host system, software programs for processing the transaction, with the software programs being selected from a plurality of software programs located on at least one different system and providing processing for different services. Independent claim 1 also recites accessing the software programs via a network to process the transaction. Independent claim 7 recites an apparatus that comprises modules that include features similar to the features recited in independent claim 1. Independent claim 8 recites a method for providing a single source for facilitating the processing of transactions comprising, <u>inter alia</u>, calling, via a network, a plurality of software programs in a solution stack located on at least one different system to process the transactions received from entities.

Although it is not clear what element of <u>Halliday et al.</u> the Office Action is alleging to be an "entity," Applicants will assume that <u>Halliday et al.</u>'s "client" is being equated to an entity. Hence, the client computer 1A of <u>Halliday et al.</u> would necessarily have to be equated to the "host system" of the claims of the present application. In such an interpretation, however, <u>Halliday et al.</u> fails to disclose at least one different system from the host system/client computer 1A which comprises the software programs. Instead, <u>Halliday et al.</u> clearly discloses that client applications 4C, which appear to be equated to software programs in the Office Action, are located on the client computer 1A. See, e.g., <u>Halliday et al.</u>, Figure 4 and paragraph 0068. In fact, <u>Halliday et al.</u> notes that an important part of the disclosed system is that the user downloads the client library 2C

(a software program) so that the user also receives a reporting functionality which is associated with the disclosed billing system. See Halliday et al., paragraphs 0053, 0056, and 0062. As such, Halliday et al. is configured in a completely different manner from Applicants' claimed invention, wherein a host system communicates via a network with at least one different system, with the at least one different system including the software programs for processing the transaction.

In the rejection, the Office Action refers to paragraph 0061 of Halliday et al., which reads as follows:

> It is well known to those skilled in the art that the environment described in FIG. 1 can also exist at a single location where no public network is involved. It should also be clear that the database host 1H can be distributed across a plurality of sites, or be replicated across a plurality of sites. It is also important to note that the public host (1F) and secure host (1G) roles can be performed by a single component. The public host 1F can even be removed altogether if security is not an issue for a particular utilization of the present invention.

Applicants respectfully submit, however, that this passage of Halliday et al. does not anticipate the combination of a host system and at least one different system comprising software programs, as recited in the independent claims of the present application. The public host 1F, secure host 1G, and database host 1H referred to in this passage of Halliday et al. do not include anything equating to software programs which process transactions. Instead, the public host 1F, secure host1G, and database host 1H are part of the billing site 1J which receives the reporting information from the client computers. See, e.g., Halliday et al., paragraph 0060. Moreover, as discussed above, Halliday et al. clearly discloses that the software programs/client applications are downloaded for use on the client computers. Thus, paragraph 0061 of Halliday et al. does not in

any way anticipate the combination of a host system and at least one different system comprising software programs recited in the independent claims of the present application.

Applicants further submit the secondary citations to <u>Suorsa</u>, <u>Yu</u>, <u>Roche</u>, <u>Vaghi</u>, and <u>Taylor et al.</u>, fail to cure the deficiencies of <u>Halliday et al.</u> with respect to the independent claims of the present application. The Office Action cites <u>Suorsa</u>, <u>Yu</u>, <u>Roche</u>, <u>Vaghi</u>, and <u>Taylor et al.</u> as suggesting specific types of software, as are recited in the dependent claims of the present application. Applicants submit, however, that these references, whether taken individually or collectively, fail to disclose or suggest the combination of a host system and at least one different system comprising software programs recited in the independent claims of the present application.

For at least the foregoing reasons, Applicants submit the invention recited in independent claims 1, 7, and 8 is patentably defined over the cited references.

The other claims are allowable by virtue of their dependency and in their own right further defining the invention. Individual consideration of the dependent claims is respectfully requested.

Applicants submit that all of the pending claims are allowable over the references of record, and that the application is in condition for allowance. Favorable reconsideration, withdrawal of the rejections, and passage to issue of the present application are earnestly solicited.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our New York office at the address shown below.

Respectfully submitted,

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